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# MEMO ENDORSED

Via Facsimile

Judge Nelson S. Román  
United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: Savio v. Delpozzo, Nissan Motor Co., Ltd., 2014 at 11:30, No.  
Nissan North America, Inc. and Motors Group, Inc. further extensions.  
13 CIV. 5606 (NSR)  
Our File No. 62112.0059

May 7, 2014

*1814*  
The application is granted.  
denied.

Nelson S. Román, U.S.D.J.

Dated: May 8, 2014

White Plains, New York 10601

Initial Conference is  
rescheduled until July 18,  
2014 at 11:30. No  
further extensions.  
Initial Report shall be  
filed by July 11, 2014.

Dear Judge Román:

I represent defendants Nissan North America, Inc. and Motors Group, Inc. in this product liability matter. I respectfully submit this joint request, with the consent of plaintiffs' attorney, to reschedule the initial court conference scheduled on May 23, 2014 to July 17 or 18, for the reasons explained below.

Plaintiffs are in the process of serving the Summons and Complaint upon Nissan Motor Co., Ltd. ("NML") in Japan. It is anticipated that service will be completed within the next 30 days, and NML will answer the Complaint within 30 days thereafter. Accordingly, we expect that NML will have appeared in the case by late June or early July. We therefore request that the initial court conference scheduled on May 23, 2014 be rescheduled to July 17 or 18 so that all defendants will be present and represented. I also submit that Mark V. Berry, who has filed a motion for *pro hac vice* admission to act as lead trial counsel for the defendants, has just started a trial that is expected to last several weeks, which will likely preclude him from attending the conference on May 23.

I have conferred with plaintiff's attorney, Stephen M. Smith, who agrees that it would be better to conduct the conference after all defendants have been served and appeared in the case, and joins in this request to reschedule the initial conference from May 23 to July 17 or 18 at any time that is convenient for the Court.

Thank you for your consideration.

Respectfully submitted,

*Homer B. Ramsey*  
Homer B. Ramsey (HR9760)

Stephen M. Smith, Esq. (by fax)

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